

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

BRAD AMOS,	)	
	)	Case No. 3:21-cv-00923
Plaintiff,	)	
	)	District Judge Richardson
v.	)	
	)	Magistrate Judge Holmes
THE LAMPO GROUP, LLC,	)	
	)	Jury Demand
Defendant.	)	

**DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

Defendant, The Lampo Group, LLC, (“Lampo”) by and through the undersigned counsel and pursuant to Rule 56 of the Federal Rules of Civil Procedure, moves the Court to enter summary judgment against Plaintiff, Brad Amos (“Amos”).<sup>1</sup>

This is an employment case. Amos, a former employee of Lampo, has filed a First Amended Complaint (Doc. #21) accusing the company of:

1. Retaliatory discharge in violation of the Tennessee Public Protection Act, T.C.A. §50-1-304;
2. Religious discrimination in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000e, *et seq.*;
3. Religious discrimination in violation of the Tennessee Human Rights Act, T.C.A. §4-21-101, *et seq.*;
4. Fraud;

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<sup>1</sup> As the Court knows, Lampo’s Second Motion to Dismiss (Doc. #30) remains pending. Lampo maintains that Amos’ First Amended Complaint should and can still be dismissed pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure. This summary judgment motion is intended to supplement, not supersede, Lampo’s Second Motion to Dismiss.

5. Promissory estoppel; and
6. Violation of T.C.A. §50-1-102.

Discovery in this case concluded on June 30, 2023. (Doc. #102). As explained in Lampo's concurrently filed memorandum of law (Doc. #114), there are no genuine disputes of material facts and Lampo is entitled to summary judgment with respect to all of Amos' claims.

Respectfully submitted,

/s/Daniel Crowell

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**CERTIFICATE OF SERVICE**

I certify that, on July 28, 2023, I filed the foregoing *Defendant's Motion for Summary Judgment* via the Court's electronic filing system, which will automatically notify and send a copy of the filing to:

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